

1 KAMALA D. HARRIS
Attorney General of California
2 GLORIA A. BARRIOS
Supervising Deputy Attorney General
3 KIMBERLEE D. KING
Deputy Attorney General
4 State Bar No. 141813
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-2581
6 Facsimile: (213) 897-2804
Attorneys for Complainant

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation

Case No. **2012-761**

13 **LANI MICHELLE WILLIAMS, AKA**
14 **LANI ZIDE, AKA LANI M.**
15 **WINZELBERG**
16 **3527 Spanish Gate Drive**
17 **Newbury Park, CA 91320**
18 **Registered Nurse License No. 502547**

ACCUSATION

Respondent.

19 Complainant alleges:

PARTIES

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department
22 of Consumer Affairs.

23 2. On or about August 26, 1994, the Board of Registered Nursing issued Registered
24 Nurse License Number 502547 to Lani Michelle Williams, aka Lani Zide, aka Lani M.
25 Winzelberg (Respondent). The Registered Nurse License was in full force and effect at all times
26 relevant to the charges brought herein and will expire on September 30, 2012, unless renewed.

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JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

STATUTORY PROVISIONS

4. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

6. Section 2750 provides that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act. (Section 2750, et seq.)

7. Section 2764 provides that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.

8. Section 822 states:

“If a licensing agency determines that its licentiate's ability to practice his or her profession safely is impaired because the licentiate is mentally ill, or physically ill affecting competency, the licensing agency may take action by any one of the following methods:

- (a) Revoking the licentiate's certificate or license.
- (b) Suspending the licentiate's right to practice.
- (c) Placing the licentiate on probation.

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1 (d) Taking such other action in relation to the licentiate as the licensing
2 agency in its discretion deems proper.

3 9. Section 125.3 provides that the Board may request the administrative law judge to
4 direct a licentiate found to have committed a violation or violations of the licensing act to pay a
5 sum not to exceed the reasonable costs of the investigation and enforcement of the case.

6 **FACTUAL BACKGROUND**

7 11. Respondent has a history of anxiety and depression leading up to a final diagnosis of
8 bipolar disorder and has attempted to commit and/or threatened to commit suicide on multiple
9 occasions. These attempts intensified around January 8, 2007, where Respondent's husband, D.
10 Williams, discovered Respondent in their home wearing her wedding dress and holding a knife.
11 Mr. Williams confiscated the knife without incident and called the Ventura County Sheriff's
12 Department (VCSD). The deputies responded to the call and found Respondent curled up on the
13 floor in her wedding dress. She was initially unresponsive, but later told the deputies that she was
14 under the influence of Klonopin and Trazodone. Respondent was later transported for a mental
15 health evaluation where she admitted that she had cut her wrist during the past Christmas season.
16 Hospital staff observed scarring on her left wrist.

17 12. On or around December 10, 2009, D. Williams discovered that Respondent had
18 driven away from their residence with her prescription bottles containing Trazodone and
19 Methadone. He notified VCSD because Respondent (who had by this time been diagnosed as
20 bipolar) had made suicide-related statements to him and had been "despondent and depressed"
21 since a child custody hearing (involving two children from a previous marriage) the previous day.
22 VCSD located Respondent at a gas station by checking her cell phone coordinates and transported
23 her to a Ventura County Mental Health facility.

24 13. On or about January 10, 2011, in the Superior Court of California, County of
25 Ventura, Case No. 2010021422, entitled People of the State of California vs. Lani Michelle
26 Williams, Respondent was convicted on her plea of nolo contendere to a misdemeanor violation
27 of Penal Code section 1465.8 (Vandalism). The imposition of sentence was suspended and
28 Respondent was released on a 36 month conditional revocable release, ordered to pay restitution

1 to the victim and to stay away from the victim, as well as payment of applicable court fees and
2 fines.

3 14. The circumstances surrounding the conviction are that on or about June 15, 2010,
4 Respondent "keyed" the victim's vehicle because she was angry that the victim's vehicle was
5 parked too close to her own vehicle.

6 **FIRST CAUSE FOR DISCIPLINE**

7 (Impairment Due to Physical or Mental Illness)

8 15 Respondent's license is subject to disciplinary action pursuant to Section 822 because
9 Respondent's ability to practice her profession safely is impaired because she is mentally or
10 physically ill affecting her competency, for the reasons stated in Paragraphs 11 through 14.

11 **SECOND CAUSE FOR DISCIPLINE**

12 (Conviction of a Substantially Related Crime)

13 17. Respondent's license is subject to disciplinary action pursuant to Section 490 and
14 2761, subdivision (f) because Respondent was convicted of an offense substantially related to the
15 qualifications, functions, and duties of a registered nurse, for the reasons stated in Paragraphs 11
16 through 14.

17 **PRAYER**

18 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
19 and that following the hearing, the Board of Registered Nursing issue a decision:

20 1. Revoking or suspending Registered Nurse License Number 502547, issued to Lani
21 Michelle Williams, aka Lani Zide, aka Lani M. Winzelberg

22 2. Ordering Lani Michelle Williams to pay the Board of Registered Nursing the
23 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
24 Professions Code section 125.3;

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3. Taking such other and further action as deemed necessary and proper.

DATED: June 25, 2012

Louise R. Bailey
LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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